

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	Chapter 11
)	Case No. 17-32273
T-A WIND DOWN, INC.,)	Hon. Janet S. Baer
)	Hearing Date: June 27, 2018
Debtor.)	Hearing Time: 10:00 a.m.

NOTICE OF MOTION

TO: Attached Service List

PLEASE TAKE NOTICE that on **Wednesday, June 27, 2018 at 10:00 a.m.** or as soon thereafter as counsel may be heard, I shall appear before the **Honorable Janet S. Baer**, in Courtroom 615 of the United States Bankruptcy Court for the Northern District of Illinois, or in her absence, before such other Judge who may be sitting in her place and stead and hearing bankruptcy motions, and shall then and there present the **Final Application of Shaw Fishman Glantz & Towbin LLC as Counsel to the Official Committee of Unsecured Creditors of T-A Wind Down, Inc. for Allowance of Compensation and Reimbursement of Expenses** for the allowance of final compensation in the amount of \$135,209.00 and reimbursement of expenses in the amount of \$2,132.43 for the period of November 6, 2017 through May 15, 2018, a copy of which is attached and herewith served upon you.

AT WHICH TIME AND PLACE you may appear if you so see fit.

Ira Bodenstein (#31268579)
Gordon E. Gouveia (#6282986)
Christina M. Sanfelippo (#6321440)
Shaw Fishman Glantz & Towbin LLC
321 North Clark Street, Suite 800
Chicago, Illinois 60654
P: (312) 541-0151
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CERTIFICATE OF SERVICE

Gordon E. Gouveia, an attorney, certifies that he caused to be served a true copy of the above and foregoing notice and attached pleading upon the Electronic Mail Notice List through the ECF System which sent notification of such filing via electronic means on June 6, 2018.

/s/ Gordon E. Gouveia

Mailing Information for Case 17-32273

Electronic Mail Notice List

The following is the list of **parties** who are currently on the list to receive email notice/service for this case.

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Manual Notice List Via U.S. Regular Pre-Paid Mail

The following is the list of **parties** who are **not** on the list to receive email notice/service for this case (who therefore require manual noticing/service). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

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Cullen and Dykman LLP
One Riverfront Plaza
Newark, NJ 07102

T-A Wind Down, Inc. f/k/a/ Tec-Air, Inc.
c/o Robert J. McMurtry, President
9200 Calumet Avenue, Suite NW01
Munster, Indiana 46321

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTER DIVISION**

IN RE:)	Chapter 11
)	Case No. 17-32273
T-A WIND DOWN, INC.,)	Hon. Janet S. Baer
)	Hearing Date: June 27, 2018
Debtor.)	Hearing Time: 10:00 a.m.

COVER SHEET FOR APPLICATION FOR PROFESSIONAL COMPENSATION

Name of Applicant:		Shaw Fishman Glantz & Towbin LLC		
Authorized to Provide Professional Services to:		The Official Committee of Unsecured Creditors		
Date of Order Authorizing Employment:		November 22, 2017 <i>nunc pro tunc</i> to November 6, 2017		
Period for Which Compensation is Sought:		November 6, 2017 through May 15, 2018		
Amount of Fees Sought:		\$135,209.00		
Amount of Expense Reimbursement Sought:		\$2,132.43		
This is a(n):	<input type="checkbox"/>	Interim Application	<input checked="" type="checkbox"/>	Final Application
If this is <u>not</u> the first application filed herein by this professional, disclose as to all prior fee applications:				
Date Filed	Period Covered	Total Requested (Fees and Expenses)	Total Allowed	Any Amount Ordered Withheld
Applicant:			Shaw Fishman Glantz & Towbin LLC	
Date: June 6, 2018			By: <u>/s/ Gordon E. Gouveia</u>	
			One of its Members	

**UNITED STATES BANKRUPTCY COURT
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IN RE:)	Chapter 11
)	Case No. 17-32273
T-A WIND DOWN, INC.,)	Hon. Janet S. Baer
)	Hearing Date: June 27, 2018
Debtor.)	Hearing Time: 10:00 a.m.

**FINAL APPLICATION OF SHAW FISHMAN GLANTZ & TOWBIN LLC AS
COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES**

Shaw Fishman Glantz & Towbin LLC (“Shaw Fishman”), as counsel to the Official Committee of Unsecured Creditors of T-A Wind Down, Inc. (the “Committee”), applies to this Court pursuant to 11 U.S.C. §§ 330 and 331, Federal Rules of Bankruptcy Procedure 2002(a)(6), 2016(a) and Local Bankruptcy Rule 5082-1, for final allowance and approval of (i) \$135,209.00 in compensation for 362.60 hours of professional services rendered by Shaw Fishman, for the period beginning November 6, 2017 through and including May 15, 2018 (the “Application Period”); and (ii) the reimbursement of \$2,132.43 for actual costs incurred incident to those services. In support of this application (the “Application”), Shaw Fishman states as follows:

JURISDICTION, BACKGROUND AND SIGNIFICANT EVENTS

1. This Court has jurisdiction over this Application under 11 U.S.C. § 330, 28 U.S.C. §§ 157 and 1334, and Internal Operating Procedure 15(a) of the United States District Court for the Northern District of Illinois. Venue of this proceeding is proper in this District pursuant to 28 U.S.C. § 1408 and 1409. This Application is a core proceeding within the meaning of 28 U.S.C. §§ 157(b) (2) (A), (M) and (O).

2. On October 27, 2017 (“Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code, initiating the above-captioned case (“Case”). The Debtor is operating its business and managing its property as a debtor-in-possession in

accordance with 11 U.S.C. §§ 1107 and 1108. No trustee or examiner has been appointed in the Chapter 11 case.

3. On November 6, 2017, the United States Trustee for the Northern District of Illinois (the “U.S. Trustee”), pursuant to Bankruptcy Code section 1102(a)(1), appointed seven members to the Committee. The members of the Committee are: (i) Quadrant Magnetics, LLC; (ii) Supply Chain Services International; (iii) Nexus Employment Solutions of Indiana, Inc.; (iv) Meany, Inc.; (v) Asahi Kasei Plastics North America, Inc.; (vi) Donald J. Ulrich Associates, Inc.; and (vii) First Call Temporary Services, Inc. On that same date, the Committee selected Shaw Fishman as its counsel.

4. On November 21, 2017, the Court entered the *Order Granting Application of the Official Committee of Unsecured Creditors for an Order Pursuant to Bankruptcy Code Sections 328(a) and 1103 Authorizing and Approving the Employment and Retention of Shaw Fishman Glantz & Towbin LLC as Counsel Nunc Pro Tunc to November 6, 2017* [Dkt. No. 76], thereby authorizing the Committee to retain Shaw Fishman as its counsel effective November 6, 2017.

SERVICES RENDERED BY SHAW FISHMAN

5. During the Application Period, Shaw Fishman provided the following services to the Committee: (a) general case administration; (b) cash collateral and debtor-in-possession financing; (c) communications and meetings with Committee; (d) communications and meetings with Debtor; (e) creditor and claim issues; (f) employee issues; (g) fee applications; (h) fee applications of Shaw Fishman; (i) general investigation; (j) hearings and agendas; (k) lien investigation; (l) motion to lift stay; (m) operating report; (n) the retention of Shaw Fishman; (o) the retention of other professionals; (p) sale of assets; (q) statements and schedules; and (r) United States Trustee matters.

6. Shaw Fishman's statements of services rendered and expenses incurred (the "Invoices") for the Application Period are attached hereto as Exhibit A and incorporated herein by reference.

7. In aggregate, Shaw Fishman's attorneys and paralegals rendered 362.6 hours of services for the Committee in connection with this Case during the Application Period. All of the services reflected on the attached Invoices pertain to this Case and were rendered at the request of the Committee. At the customary hourly rates charged by Shaw Fishman's attorneys and paralegals, the aggregate amount due Shaw Fishman for the services rendered to the Debtor during the Application Period is \$135,209.00, for an average hourly rate of approximately \$372.88.

8. In evaluating this Application, this Court should consider the value of the services rendered by Shaw Fishman for the Committee, the nature and complexity of the issues presented, the skill required to perform the legal services properly, the customary fees charged by other professionals in similar cases, the experience and ability of the attorneys involved and the compensation amounts awarded in similar cases. These factors, whether viewed individually or collectively, support an award of the requested compensation in full. All of the services for which compensation is requested were services that, in Shaw Fishman's billing judgment, were necessarily rendered after due consideration of the expected costs and anticipated benefits of such services.

9. In an effort to provide the Court and parties in interest with understandable information concerning the amount and nature of Shaw Fishman's services during the Application Period, and in compliance with Local Bankruptcy Rule 5082-1, Shaw Fishman has classified its services into sixteen (16) separate categories of services as follows:

Description	Total Hours	Total Fees Incurred
Case Administration	20.6	\$7,470.00
Cash Collateral / DIP	52.2	\$21,810.00
Communications – Meetings with Committee	26.5	\$10,686.00
Communications – Meetings with Debtor	3.9	\$1,630.00
Creditors and Claims	9.6	\$3,623.00
Employee Issues	0.1	\$40.00
Fee Applications – Others	4.1	\$1,810.00
Fee Applications - Shaw Fishman	15.9	\$4,409.00
General Investigation	37.1	\$13,081.00
Hearings/Agendas	6.5	\$2,600.00
Lien Investigation	87	\$26,813.00
Motion to Lift Stay	0.6	\$290.00
Operating Reports	0.2	\$100.00
Retention- Shaw Fishman	5.2	\$1,456.00
Retention of Professionals	6.6	\$3,030.00
Sale of Assets	83.9	\$35,505.00
Statements and Schedules	2.2	\$656.00
United States Trustee Matters	0.4	\$200.00
TOTAL	362.6	\$135,209.00

10. The Invoices provide detailed descriptions of all services rendered in each of the categories, and the timekeeper, date, and amount of time expended in each category. In addition, the following are descriptions of each of Shaw Fishman's principal categories of activities, as well as charts summarizing which professionals rendered services in the category, and the total time and dollar value of services for each category. No description is provided for categories where the value of services is less than \$1,500.00.

A. Case Administration

11. Shaw Fishman expended 20.6 hours of professional services having a value of \$7,470.00 pertaining to, among other things: (a) preparing Committee bylaws and execution of

same; (b) drafting motion to establish information protocol; (c) work relating to wind down strategy; and (d) research related to treatment of chapter 11 administrative expenses.

12. The chart below is a summary of the total amount of time entered by each timekeeper for this category during the Application Period, as well as the corresponding dollar value of those services.

Professional	Hours	Amount
Ira Bodenstein	3.4	\$1,700.00
Gordon E. Gouveia	11.0	\$4,400.00
Christina M. Sanfelippo	4.8	\$1,053.00
Patricia M. Fredericks	0.9	\$207.00
Francesca Zozzarco	0.5	\$110.00

B. Cash Collateral / DIP Financing

13. Shaw Fishman expended 52.2 hours of professional services having a value of \$21,810.00 pertaining to, among other things: (a) reviewing interim DIP order and credit agreement; (b) reviewing receipts and disbursements report; (c) reviewing and researching objections to the Debtor's DIP financing motion; (d) review objection of US Trustee to DIP motion and attend hearing on same; and (e) review of Leaders discovery.

14. The chart below is a summary of the total amount of time entered by each timekeeper for this category during the Application Period, as well as the corresponding dollar value of those services.

Professional	Hours	Amount
Ira Bodenstein	19.2	\$9,600.00
Gordon E. Gouveia	27.5	\$11,000.00
Francesca Zozzarco	5.5	\$1,210.00

C. Communications/Meetings with Committee

15. Shaw Fishman expended 26.5 hours of professional services having a value of \$10,686.00 pertaining to, among other things: (a) prepare agendas and participate in weekly committee status calls; (b) confer with committee to discuss sale negotiations; and (c) communicating with committee concerning resignation of committee member.

16. The chart below is a summary of the total amount of time entered by each timekeeper for this category during the Application Period, as well as the corresponding dollar value of those services.

Professional	Hours	Amount
Ira Bodenstein	9.1	\$4,350.00
Gordon E. Gouveia	12.6	\$5,040.00
Christina M. Sanfelippo	4.8	\$1,296.00

D. Communications/Meetings with Debtor

17. Shaw Fishman expended 3.9 hours of professional services having a value of \$1,630.00 pertaining to, among other things: (a) information requests and request for financial reporting information; and (b) confer with debtor concerning wind down of case.

18. The chart below is a summary of the total amount of time entered by each timekeeper for this category during the Application Period, as well as the corresponding dollar value of those services.

Professional	Hours	Amount
Ira Bodenstein	.7	\$350.00
Gordon E. Gouveia	3.2	\$1,280.00

E. Creditors and Claims

19. Shaw Fishman expended 9.6 hours of professional services having a value of \$3,623.00 pertaining, to among other things: (a) reviewing debtor's motion to establish claims bar date; (b) review debtor's motion for authority to pay section 503(b)(9) claims; (c) confer with creditors concerning need and timing of filing proofs of claim; and (d) review of claims filed by committee members.

20. The chart below is a summary of the total amount of time entered by each timekeeper for this category during the Application Period, as well as the corresponding dollar value of those services.

Professional	Hours	Amount
Ira Bodenstein	1.6	\$800.00
Gordon E. Gouveia	5.1	\$2,040.00
Christina M. Sanfelippo	2.9	\$783.00

F. Fee Applications – Others

21. Shaw Fishman expended 4.1 hours of professional services having a value of \$1,810.00 pertaining to, among other things; (a) reviewing motion for interim compensation procedures; (b) review 321 fee calculation; and (c) review monthly fee statements for interim compensation.

22. The chart below is a summary of the total amount of time entered by each timekeeper for this category during the Application Period, as well as the corresponding dollar value of those services.

Professional	Hours	Amount
Ira Bodenstein	1.7	\$850.00
Gordon E. Gouveia	2.4	\$960.00

G. Fee Applications – Shaw Fishman

23. Shaw Fishman expended 15.9 hours of professional services having a value of \$4,409.00 pertaining to, among other things, (a) reviewing, revising, and filing monthly fee statements; and (b) initial draft of first interim fee application.

24. The chart below is a summary of the total amount of time entered by each timekeeper for this category during the Application Period, as well as the corresponding dollar value of those services.

Professional	Hours	Amount
Ira Bodenstein	1.1	\$550.00
Gordon E. Gouveia	2.8	\$1,120.00
Christina M. Sanfelippo	4.2	\$945.00
Patricia M. Fredericks	7.8	\$1,794.00

H. General Investigation

25. Shaw Fishman expended 37.1 hours of professional services having a value of \$13,081.00 pertaining, among other things; (a) drafting information requests to Debtor; (b) investigation of potential insider claims; (c) reviewing financial and corporate governance documents; (d) analyzing 90 day payables report; (e) drafting and presenting motion for 2004 exam; (f) preparing Rule 2004 Subpoenas and riders for same; (g) reviewing document productions; (h) review loan summary; and (i) preparing for McMurtry interview.

26. The chart below is a summary of the total amount of time entered by each timekeeper in this category during the Application Period, as well as the corresponding dollar value of those services.

Professional	Hours	Amount
Ira Bodenstein	3.6	\$1,800.00
Gordon E. Gouveia	17.2	\$6,880.00

Christina M. Sanfelippo	16.3	\$4,401.00
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I. Hearings/Agendas

27. Shaw Fishman expended 6.5 hours of professional services having a value of \$2,600.00 pertaining to attending hearings on various motions.

28. The chart below is a summary of the total amount of time entered by each timekeeper for this category during the Application Period, as well as the corresponding dollar value of those services.

Professional	Hours	Amount
Gordon E. Gouveia	6.5	\$2,600.00

J. Lien Investigation

29. Shaw Fishman expended 87.0 hours of professional services having a value of \$26,813.00 pertaining to, among other things; (a) reviewing UCC filings and loan documents; (b) researching law on perfection of security interests and possible preference actions; (c) analyzing loan documents to determine validity of liens and summarizing same; (d) researching case law on guarantor liability; (e) reviewing additional documents produced by Byline Bank; (f) preparing stipulation and agreed order to extend challenge period deadline; and (g) preparing, reviewing and revising the lien investigation memo and sending the same to Committee.

30. The chart below is a summary of the total amount of time entered by each timekeeper for this category during the Application Period, as well as the corresponding dollar value of those services.

Professional	Hours	Amount
Ira Bodenstein	5.9	\$2,950.00
Gordon E. Gouveia	16.2	\$6,480.00
Christina M. Sanfelippo	62.1	\$16,767.00

Patricia M. Fredericks	2.8	\$616.00
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K. Retention of Professionals

31. Shaw Fishman expended 6.6 hours of professional services having a value of \$3,030.00 pertaining to reviewing and debtor's application to employ ordinary course professionals and court appearances for same.

32. The chart below is a summary of the total amount of time entered by each timekeeper for this category during the Application Period, as well as the corresponding dollar value of those services.

Professional	Hours	Amount
Ira Bodenstein	3.9	\$1,950.00
Gordon E. Gouveia	2.7	\$1,080.00

L. Sale of Assets

33. Shaw Fishman expended 83.9 hours of professional services having a value of \$35,505.00 pertaining to, among other things: (a) conferring with Committee regarding limited objection of sale procedures and preparing and filing objection to same; (b) meeting with debtor's counsel and interested parties on prepetition marketing process and sale process; (c) negotiating with stalking horse bidder and concessions requested from same; and (d) revising bidding procedures.

34. The chart below is a summary of the total amount of time entered by each timekeeper for this category during the Application Period, as well as the corresponding dollar value of those services.

Professional	Hours	Amount
Ira Bodenstein	32.6	\$16,300.00
Gordon E. Gouveia	44.3	\$17,720.00

Christina M. Sanfelippo	7.0	\$1,485.00
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Summary of Services Rendered By Professional

35. In summary, the total compensation sought for each professional with respect to the aforementioned categories is as follows:

Professional	Position	Hourly Rate	Billed Hours	Amount
Ira Bodenstein	Member	\$500.00	83.6	\$41,800.00
Ira Bodenstein	Member	\$0.00	.4	\$0.00
Gordon E. Gouviea	Member	\$400.00	152.4	\$60,960.00
Christina M. Sanfelippo	Associate	\$270.00	105.6	\$28,512.00
Christina M. Sanfelippo	Associate	\$0.00	3.1	\$0.00
Patricia M. Fredericks	Paralegal	\$230.00	8.7	\$2,001.00
Patricia M. Fredericks	Paralegal	\$220.00	2.8	\$616.00
Francesca Zozzarco	Paralegal	\$220.00	6.0	\$1,320.00

36. In evaluating this Application, this Court should consider the following: (a) the value of the services rendered by Shaw Fishman; (b) the nature and complexity of the issues presented; (c) the skill required to perform the legal services properly; (d) the customary fees charged by other professionals in this case and in similar cases; (e) the experience and ability of the professionals involved; and (f) the amount of compensation awarded in similar cases. When viewed either individually or collectively, these factors support an award of the requested compensation in full.

37. The hourly rates charged by Shaw Fishman with respect to its legal services compare favorably with the rates charged by other Chicago metropolitan firms having attorneys and paralegals with similar experience and expertise as the Shaw Fishman professionals. Further, the amount of time spent by Shaw Fishman with respect to the Case is reasonable given

the difficulty of the issues presented, the time constraints imposed by the circumstances, and the ultimate benefit to the Estate.

38. Shaw Fishman conscientiously attempted to avoid having multiple attorneys appear. In certain circumstances, however, it was necessary for more than one Shaw Fishman attorney to confer or appear at the same time. When possible, Shaw Fishman would have one attorney handle multiple matters. To the greatest extent possible, meetings, court appearances, negotiations, and other matters were handled on an individual basis.

39. The issues presented in the Case were legally and factually complex. Given the criteria set forth in 11 U.S.C. § 330, namely: (a) the nature, extent and value of the services; (b) the time spent; (c) the rates charged for such services; (d) the performance of the services within a reasonable amount of time commensurate with the complexity, importance and nature of the problem, issue or task addressed; and (e) the reasonableness of the services based on the compensation charged by comparably skilled practitioners in other bankruptcy and non-bankruptcy matters, Shaw Fishman respectfully submits that the requested compensation represents a fair and reasonable amount that should be allowed in full and on a final basis.

EXPENSES

40. The aggregate amount of expenses for which reimbursement is being sought is \$2,132.43. All of the expenses for which reimbursement is requested are expenses which Shaw Fishman customarily recoups from all of its clients. An itemization of the expenses is attached hereto as part of Exhibit A. The types of costs for which reimbursement is sought are listed below:

Internal Photocopy	10¢ per page
Commercial/Court Photocopy	actual cost
Commercial Messenger	actual cost
Conference Calls	actual cost
Local Telephone	no charge

Outgoing Facsimiles	no charge
Incoming Facsimiles	no charge
On Line Legal or Factual Research (Pacer)	actual or prorated percentage cost
Postage	actual cost
Overnight Delivery (<i>e.g.</i> , Federal Express)	actual cost
Filing/Recording Fees	actual cost
Deposition Costs	actual cost
Local and Long Distance Travel	actual cost

41. The specific expenses for which reimbursement is requested during the Application Period are as follows:

PACER	\$114.00
Postage	\$112.93
Overnight Delivery (<i>e.g.</i> , Federal Express)	\$107.97
Same Day Delivery (<i>e.g.</i> , Messenger)	\$302.01
Westlaw	\$1,360.37
Conference Call	\$135.15
Total:	\$2,132.43

42. All expenses incurred by Shaw Fishman incidental to its services were customary and necessary expenses. All expenses were billed in the same manner as Shaw Fishman bills non-bankruptcy clients. Further, the expenses for which reimbursement is sought constitute the types and amounts previously allowed by bankruptcy judges in this and other judicial districts.

PAYMENTS RECEIVED BY SHAW FISHMAN TO DATE

43. Pursuant to the Retention Order, Shaw Fishman submitted monthly invoices to the Debtors, with copies to this Court and other parties entitled to notice thereof, for interim compensation and expense reimbursement pursuant to the Interim Compensation Order.

Statement for Period Ending:	Payments Actually Received		
	80% Legal Fees	Expenses Allowed	Subtotal
11/30/2017	\$37,140.00	\$21.84	\$37,161.84
12/31/17	\$34,170.40	\$429.16	\$34,599.56
1/31/2018	\$25,133.60	\$39.87	\$25,173.47
2/28/2018	\$5,853.60	\$0.00	\$5,853.60

3/31/2018	<i>pending</i>	<i>pending</i>	<i>pending</i>
Total	\$102,297.60	\$490.87	\$102,788.47

44. Shaw Fishman received no objection to the Monthly Statements for the period beginning November 6, 2017 through and including March 31, 2018. Shaw Fishman did not serve Monthly Statements for the periods ending April 30, 2018 or May 15, 2018.

45. Shaw Fishman deferred its request for reimbursement of expenses \$1,474.37 related to Westlaw and PACER charges in its monthly fee statements. Shaw Fishman is now seeking reimbursement of those deferred expenses (the “Deferred Expenses”).

COMPLIANCE WITH 11 U.S.C. § 504

46. Other than as provided for and allowed by 11 U.S.C. § 504, there is no agreement between Shaw Fishman and any other firm, person or entity for the sharing of division of any compensation payable to Shaw Fishman.

NOTICE

51. Notice of this Application has been provided in accordance with Federal Rule of Bankruptcy Procedure 2002(a)(6) to the Debtor, the Office of the United States Trustee, and all creditors requesting notice via CM/ECF, U.S. mail and email service. Shaw Fishman requests that the Court finds this notice sufficient under the circumstances.

CONCLUSION

WHEREFORE, Shaw Fishman Glantz and Towbin, LLC requests the entry of an order, substantially in the form attached hereto, that:

a. Approves and allows Shaw Fishman \$135,209.00 in compensation, on a final basis, for services provided during the Application Period beginning November 6, 2017 through and including May 15, 2018;

b. Approves and allows Shaw Fishman \$2,132.43 in expense reimbursement, on a final basis, including \$1,474.37 in Deferred Expenses, for expenses incurred during the Application Period beginning November 6, 2017 through and including May 15, 2018;

c. Approves and authorizes payment on a final basis of the balance of \$34,552.96 in compensation and expenses which were not previously paid to Shaw Fishman; and

e. Provides Shaw Fishman with such additional relief as may be appropriate and just under the circumstances.

Respectfully submitted,

Shaw Fishman Glantz & Towbin LLC

Dated: June 6, 2018

By: /s/ Gordon E. Gouveia
One of its members

Ira Bodenstein (#31268579)
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